

EXHIBIT 1

From: [Staren, Devon](#)
To: ["rflynn48@gmail.com"](#); ["Jay V. Surgent"](#); ["Donald A. Klein"](#)
Cc: [Grossman, Drew](#); [Maher, Daniel](#)
Subject: FW: SEC v. Vuuzle
Date: Monday, July 19, 2021 1:09:00 PM
Attachments: [VUUZLE+INVESTMENT+AGREEMENT FOR NEW ACCOUNT JULY 6, 2021.docx](#)

Counsel and Mr. Flynn,

We write to bring to your attention certain problematic communications that are being sent to Vuuzle investors. Attached is a document that indicates a new unregistered and potentially fraudulent offering of Vuuzle securities – this time, in the form of tokens. We also ask you for any additional information on this and similar communications that are being sent to current Vuuzle investors. Please note that this look like misconduct – in addition to that already charged in our complaint – and we reserve our right to bring this to the Court's attention if it continues.

Thanks,
Devon

Devon Leppink Staren
Trial Counsel, Enforcement Division
U.S. Securities and Exchange Commission
100 F Street NE
Washington DC 20549
202-551-5346

From: Staren, Devon
Sent: Monday, July 19, 2021 1:04 PM
To: Jacob S. Frenkel (jfrenkel@dickinson-wright.com) <jfrenkel@dickinson-wright.com>; 'Aimee R. Gibbs' <AGibbs@dickinson-wright.com>; 'Seth B. Waxman' <SWaxman@dickinson-wright.com>
Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>
Subject: FW: SEC v. Vuuzle

Counsel,

We have not heard back from you on this earlier email. It appears that Vuuzle is continuing to send problematic emails to investors in what appears to be a new unregistered and potentially fraudulent offering of securities – this time, in the form of tokens. Once again, we want to bring this to your attention and ask you for any additional information on this and similar communications that are being sent to current Vuuzle investors. As mentioned earlier, this look like additional misconduct and we continue to reserve our right to bring this to the Court's attention if it continues.

I am happy to discuss further if you would like.

Thanks,

Devon Staren

From: Staren, Devon
Sent: Tuesday, July 06, 2021 2:35 PM
To: Jacob S. Frenkel (jfrenkel@dickinson-wright.com) <jfrenkel@dickinson-wright.com>; Aimee R. Gibbs <AGibbs@dickinson-wright.com>; Seth B. Waxman <SWaxman@dickinson-wright.com>
Cc: Grossman, Drew <grossmandr@SEC.GOV>; Maher, Daniel <MaherD@SEC.GOV>
Subject: SEC v. Vuuzle

Counsel,

Last week, we learned that several existing Vuuzle investors were emailed a link to this purported “investment agreement,” along with a message that investors had 5 days to sign it or they would unilaterally be deemed by Vuuzle to have agreed to its terms. We are bringing this to your attention because there are several problematic provisions within this document, including requiring investors to represent they conducted due diligence on the company prior to investing and an agreement to provide assistance to Ronald Flynn (the Founder) in proceedings before any “Relevant Authority.”

We do not know whether you were aware of this investor communication. If you have any additional information, please let us know. However, please note that, in our view, this looks like misconduct and we reserve our right to bring this to the Court’s attention if it continues.

I am happy to discuss further if you would like.

Thanks,
Devon

Devon Leppink Staren
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